

Exhibit 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**IN RE ALTA MESA RESOURCES, INC.
SECURITIES LITIGATION**

Case No. 4:19-cv-00957

**RULE 26(a)(1) INITIAL DISCLOSURES
FOR DEFENDANTS BAYOU CITY ENERGY MANAGEMENT, LLC
AND WILLIAM MCMULLEN**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Bayou City Energy Management, LLC and William McMullen (collectively, the “Bayou City Defendants”) submit the following initial disclosures (“Disclosures”) for the above-captioned case.

Bayou City Defendants’ Disclosures are based on information reasonably available to them as of the date hereof. Bayou City Defendants have not yet completed their investigation, collection of information, discovery, or analysis relating to these actions. By making these disclosures, Bayou City Defendants do not represent that they have identified every category of document, tangible thing, or witness possibly relevant to Bayou City Defendants’ defenses in this lawsuit. Accordingly, pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, Bayou City Defendants reserve the right to modify, supplement, or amend the information provided in these Disclosures. Bayou City Defendants further reserve the right to use and introduce such supplemental information, including testimony from any person identified in such supplemental information, or any subsequently produced documents, at any trial of this action.

Bayou City Defendants reserve the right to rely on individuals or documents identified in the Rule 26(a)(1) disclosures of any other party to this action to support their defenses or counterclaims and incorporate those disclosures herein by reference without making any

representations concerning the accuracy of the information contained therein. Bayou City Defendants also reserve the right to rely upon the individuals identified in these Disclosures for subjects other than those identified herein. Bayou City Defendants make these Disclosures without waiving any privileges Bayou City Defendants may have, and without waiving any objections Bayou City Defendants may have to the introduction or use of any information or documents subsequent to these Disclosures, or any right Bayou City Defendants may have to object to or oppose discovery requests, whether made before or after these Disclosures. Bayou City Defendants specifically reserve all objections, including, but not limited to: (a) relevance; (b) attorney-client privilege; (c) work product protection; (d) privacy; (e) any applicable immunity or privilege afforded under federal or state law; (f) undue burden; (g) undue expense; (h) relevance and materiality; (i) overbreadth; (j) vagueness; (k) admissibility; and (l) confidentiality.

Subject to and without waiver of the foregoing reservations and limitations, Bayou City Defendants make the following disclosures:

I. RULE 26(a)(1)(A)(i): Individuals Likely to Have Discoverable Information that Bayou City Defendants Might Use to Support Their Claims or Defenses

Based on the allegations in the Second Corrected Amended Class Action Complaint [ECF No. 69] and Bayou City Defendants' investigation thus far, Bayou City Defendants believe that the individuals and organizations listed below are likely to have discoverable information that Bayou City might use to support their claims or defenses.

Name (and if known, address and telephone number)	Type of Information
FNY Partners Fund LP (Lead Plaintiff) c/o Entwistle & Cappucci LLP Frost Bank Tower 401 Congress Avenue, Suite 1170 Austin, TX 78701 Telephone: (512) 710-5960	FNY Partners Fund LP's allegations regarding purported misstatements, purported corrective disclosures, and any other allegation in the Second Corrected Amended Class Action Complaint.

<p>FNY Managed Accounts, LLC (Lead Plaintiff) c/o Entwistle & Cappucci LLP Frost Bank Tower 401 Congress Avenue, Suite 1170 Austin, TX 78701 Telephone: (512) 710-5960</p>	<p>FNY Managed Accounts, LLC's allegations regarding purported misstatements, purported corrective disclosures, and any other allegation in the Second Corrected Amended Class Action Complaint.</p>
<p>Paul J. Burbach (Lead Plaintiff) c/o Entwistle & Cappucci LLP Frost Bank Tower 401 Congress Avenue, Suite 1170 Austin, TX 78701 Telephone: (512) 710-5960</p>	<p>Paul J. Burbach's allegations regarding purported misstatements, purported corrective disclosures, and any other allegation in the Second Corrected Amended Class Action Complaints.</p>
<p>Plumbers and Pipefitters National Pension Fund (Lead Plaintiff) c/o Entwistle & Cappucci LLP Frost Bank Tower 401 Congress Avenue, Suite 1170 Austin, TX 78701 Telephone: (512) 710-5960</p>	<p>Plumbers and Pipefitters National Pension Fund's allegations regarding purported misstatements, purported corrective disclosures, and any other allegation in the Second Corrected Amended Class Action Complaint.</p>
<p>Camelot Event Driven Fund, a series of Frank Funds Trust (Plaintiff) c/o Labaton Sucharow LLP 140 Broadway New York, NY 10005 Telephone: (212) 907-0650</p>	<p>Camelot Event Driven Fund's allegations regarding purported misstatements and purported corrective disclosures, and any other allegation in the Second Corrected Amended Class Action Complaint.</p>
<p>Any future Lead Plaintiff or Plaintiff that may be added or appointed TBD</p>	<p>Allegations regarding purported misstatements, purported corrective disclosures, and any other allegation in the Second Corrected Amended Class Action Complaint.</p>
<p>Harlan Chappelle (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>Winston & Strawn LLP 800 Capitol Street, Suite 2400 Houston, TX 77002-2925 Tel.: (713) 615-2699 Fax: (713) 651-2700</p>	

<p>Stephen Coats (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>Donald Dimitrievich (Defendant) c/o Quinn, Emanuel, Urquhart & Sullivan, LLP 711 Louisiana Street, Suite 500 Houston, TX 77002</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>Michael Ellis (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p> <p>Winston & Strawn LLP 800 Capitol Street, Suite 2400 Houston, TX 77002-2925 Tel.: (713) 615-2699 Fax: (713) 651-2700</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>William Gutermuth (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>James Hackett (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>Pierre Lapeyre, Jr. (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>

<p>David Leuschen (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>Randy Limbacher (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>William McMullen (Defendant) c/o Kirkland & Ellis LLP 609 Main Street Houston, Texas 77002 Telephone: (713) 836-3600 Facsimile: (713) 836-3601</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>Donald Sinclair (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>Ronald Smith (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>Jeffrey Tepper (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>
<p>Thomas Walker (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200</p>	<p>Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.</p>

Diana Walters (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200	Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.
Riverstone Holdings LLC (Defendant) c/o Latham & Watkins LLP 555 Eleventh Street, NW Suite 1000 Washington DC 20004 Telephone: (202) 637-2200	Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.
Mark Stoner Partner Bayou City Energy Management, LLC c/o Kirkland & Ellis LLP 609 Main Street Houston, Texas 77002 Telephone: (713) 836-3600 Facsimile: (713) 836-3601	Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.
Andrew Koehler Managing Director Bayou City Energy Management, LLC c/o Kirkland & Ellis LLP 609 Main Street Houston, Texas 77002 Telephone: (713) 836-3600 Facsimile: (713) 836-3601	Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.
Highbridge Principal Strategies, LLC (Defendant) c/o Quinn, Emanuel, Urquhart & Sullivan, LLP 711 Louisiana Street, Suite 500 Houston, TX 77002	Bayou City Defendants' defenses and the allegations in the Second Corrected Amended Class Action Complaint.

II. RULE 26(a)(1)(A)(ii): Description By Category and Location of Documents, Electronically Stored Information, and Tangible Things (“Documents”) that Bayou City Defendants Have in Their Possession, Custody, or Control that Bayou City Defendants Might Use to Support Their Claims or Defenses

Based on the allegations in the Second Corrected Amended Class Action Complaint [ECF No. 69] and Bayou City Defendants' investigation thus far, Bayou City Defendants presently

believes that they may use the following categories of documents, data compilations, or tangible things to support their claims or defenses, to the extent such documents exist, are within Bayou City Defendants' possession, custody, or control, and are not privileged:

- Documents relating to Lead Plaintiff(s)' and Plaintiffs' shareholder status and investments in Alta Mesa Resources, Inc.'s securities;
- Public documents, including media articles and public filings by Bayou City Energy Management, LLC, and Alta Mesa Resources Inc. and/or related entities; and
- Documents referenced and relied upon in the Second Corrected Amended Class Action Complaint [ECF No. 69], to the extent those documents are in Bayou City Defendants' possession, custody, and/or control.

In addition to the documents described above, Bayou City Defendants may also rely on publicly available documents, documents produced by Plaintiffs, or third parties. Bayou City Defendants' document identification to date is based solely upon such information and documents that Bayou City Defendants have been able to discover thus far, as well as Bayou City Defendants' present analysis of the case, and shall not in any way be deemed to be a representation that additional documents do not exist. Accordingly, Bayou City Defendants reserve the right to amend or supplement this disclosure pursuant to Rule 26(e) if additional documents are identified. Furthermore, Bayou City Defendants reserve the right to supplement or modify this disclosure based on information or documents subsequently identified as pertinent to disputed facts.

III. Identities of Experts and their Opinions

Bayou City Defendants will provide Lead Plaintiff with the identities of any experts and any expert reports in accordance with the deadlines agreed to in the scheduling order to be entered in this case.

IV. RULE 26(a)(1)(A)(iii): Computation of Damages Claimed by Bayou City Defendants

None. Bayou City Defendants reserve the right to seek attorneys' fees, expenses, and costs incurred in connection with this litigation. Bayou City Defendants reserve the right to supplement or modify this disclosure.

V. RULE 26(a)(1)(A)(iv): Insurance Agreements

Plaintiffs have requested the production of insurance agreements covered by Federal Rule of Civil Procedure 26(a)(1)(A)(iv) pursuant to Request No. 52 of the Lead Plaintiffs' First Request for Production of Documents served on Bayou City Energy Management, LLC on April 28, 2021, and to Request No. 53 of Lead Plaintiffs' First Request for Production of Documents served on William McMullen on April 28, 2021. Bayou City Defendants refer to, and incorporate herein in their entirety, their responses to these Requests in their respective Objections and Responses to Lead Plaintiffs' First Request for Production of Documents served on June 8, 2021.

Houston, Texas
June 15, 2021

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Respectfully submitted,

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Counsel for Bayou City Energy Management, LLC and William McMullen

CERTIFICATE OF SERVICE

I certify that on June 15, 2021, a true and correct copy of the foregoing was served on Plaintiffs' counsel.

/s/ *Kenneth A. Young*
Kenneth A. Young